IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

Tarah Fleischman, as Parent and Guardian of C.F., a minor, and in her own right

Plaintiff,

v.

FOREST TRAIL ACADEMY, LLC, ATLANTIS LEADERSHIP ACADEMY, LLC, RANDALL COOK, LISA COOK, UNITED SECURE YOUTH TRANSPORT AGENCY, LLC, and DEBBIE CELANI,

Defendants.

CIVIL ACTION NO. 9:24-cv-81457-RLR

JURY TRAIL DEMANDED

NOTICE OF SETTLEMENT AS TO DEFENDANTS DEBBIE CELANI AND TEEN SENTINEL, LLC ONLY

Plaintiff, Tarah Fleischman, as Parent and Guardian of C.F., a minor, and in her own right, by and through undersigned counsel, pursuant to S.D. Fla. L.R. 16.4, hereby notifies the Court that the parties have reached a settlement with regards to Defendants Debbie Celani and Teen Sentinel, LLC ("Celani Defendants"), only, in the above-captioned matter. The matter pertaining to all remaining defendants has not been settled.

Plaintiff and the Celani Defendants are currently in the process of preparing and finalizing the settlement documents and payments. Upon execution of the settlement agreement and receipt of the settlement funds, the parties anticipate filing a stipulation of dismissal with prejudice within 45 days, or less.

Accordingly, Plaintiff respectfully requests that the Court stay all pending deadlines as they apply to Defendants Debbie Celani and Teen Sentinel, LLC, only for 45 days to allow for completion of the settlement process.

RESPECTFULLY submitted this 6th day of June, 2025.

THE HAGGARD LAW FIRM, PA

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the forgoing has been furnished by electronic filing with the Clerk of the court via CM.ECF, which will send notice of electronic filing to all counsel of record on June 6, 2025.

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